

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CARLOS AUGUSTO LOPES

Plaintiff,

- against -

**MELLON INVESTOR SERVICES LLC,
JP MORGAN CHASE & CO.,
WACHOVIA CORPORATION, WACHOVIA
BANK, N.A., WACHOVIA/FIRST UNION
BANK, HELENA BUSHROE,
JOHN DOE AND JANE DOE**

Defendants.
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07 CV 5928

**DISCLOSURES PURSUANT
TO RULE 26(A) OF THE
FEDERAL RULES OF
CIVIL PROCEDURE**

JPMorgan Chase & Co. (hereafter “Defendant” or “JPMC”), by its attorneys, the JPMorgan Chase Legal Department, respectfully submit its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

A. The names and, if known and presently available, the address and telephone numbers for individuals likely to have discoverable information relevant to the facts alleged in Plaintiff’s Complaint are: Plaintiff, Carlos Augusto Lopes, Helena Bushroe, Employees of Mellon Investor Services LLC.

B. Documents, data compilations, and tangible things that are relevant to disputed facts alleged with particularity in the pleadings include:

1. Employee records of Plaintiff; and
2. Files maintained or obtained by JPMC’s Human Resources Department concerning Plaintiff.

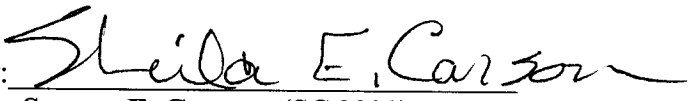
Copies of the documents referred to above will be provided to Plaintiff upon Defendant's receipt of a Stipulation and Order of Confidentiality which has been executed by Plaintiff and his attorneys and "So Ordered" by the Court.

C. The provisions of Federal Rule of Civil Procedure 26(a)(1)(C) are not applicable at this time because Defendant currently is not seeking damages from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement their response as appropriate.

Dated: New York, New York
October 12, 2007

**JPMORGAN CHASE BANK, N.A. LEGAL
DEPARTMENT**

By: 
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARLOS AUGUSTO LOPES, :

Plaintiff, : 07 CIV 5928 (DLC)

- against - :

MELLON INVESTOR SERVICES LLC, JP : AFFIDAVIT OF SERVICE
MORGAN CHASE & CO., WACHOVIA :
CORPORATION, WACHOVIA BANK, N.A., :
WACHOVIA/FIRST UNION BANK, HELENA :
BUSHROE, JOHN DOE AND JANE ROE, :

Defendants.

----- X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

STUART RADESKY, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank, N.A.

That on the 17th day of October , 2007 deponent served the within:

**DISCLOSURE PRUSUANT TO RULE 26 (A) OF
THE FEDERAL RULE OF CIVIL
PROCEDURES**

upon the name(s) listed below by depositing a true copy of the same securely enclosed in a first class, postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service.

UPON:

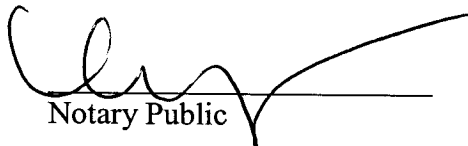
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Sworn to before me
this 17th day of October , 2007


Notary Public

MARLENE M. THOMPSON
Notary Public, State of New York
No. 01TH6161011
Qualified in Kings County
Certificate filed in New York County
Commission Expires February 12, 2011